

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

GREEN PARTY OF TENNESSEE,)	
CONSTITUTION PARTY OF)	
TENNESSEE,)	
Plaintiffs,)	
vs.)	Case No.: 3:11-cv-00692
)	
TRE HARGETT, in his official capacity)	Judge Waverly Crenshaw
as Tennessee Secretary of State, and MARK)	
GOINS, in his official capacity as)	
Coordinator of Elections for the State of)	
Tennessee,)	
Defendants.)	

**STIPULATIONS TO QUALIFICATIONS AND DIRECT TESTIMONY
OF EXPERT WITNESSES AT TRIAL**

COME NOW, Plaintiffs, GREEN PARTY OF TENNESSEE and CONSTITUTION PARTY OF TENNESSEE and Defendants, TRE HARGETT, in his official capacity as Tennessee Secretary of State, and MARK GOINS, in his official capacity as Coordinator of Elections for the State of Tennessee, by and through their undersigned counsel, and for their Stipulations to Qualifications and Direct Testimony of Expert Witnesses at Trial state:

1. Pursuant to Local Rule 39.01(c)(6)(c), Defendants stipulate to the qualifications of Mr. Richard Winger as an expert thereby obviating the necessity for qualification at trial.
2. Pursuant to Local Rule 39.01(c)(6)(c), Plaintiffs stipulate to the qualifications of Dr. M.V. Hood III and Dr. Daniel E. Ho as experts thereby obviating the necessity for qualification at trial.
3. The parties stipulate that Mr. Richard Winger's expert report titled "Supplemental Expert Report of Richard Winger" dated February 9, 2015, attached hereto as Exhibit A, shall constitute Mr. Winger's direct testimony at trial pursuant to Local Rule 39.01(c)(6)(c) obviating the need for Mr. Winger to read his report aloud to the trier of fact.
4. The parties stipulate that Dr. M.V. Hood III's expert report attached to his Declaration dated May 13, 2015, attached hereto as Exhibit B, shall constitute Dr. Hood's direct testimony at trial pursuant to Local Rule 39.01(c)(6)(c) obviating the need for Dr. Hood to read his report aloud to the trier of fact.
5. The parties stipulate that Dr. Daniel E. Ho's expert report titled "Expert Witness Report" dated May 14, 2015, attached hereto as Exhibit C, shall constitute Dr. Ho's direct testimony at trial pursuant to Local Rule 39.01(c)(6)(c) obviating the need for Dr. Ho to read his report aloud to the trier of fact.

6. Notwithstanding the foregoing, the parties reserve the right to object to portions of the cited experts qualifications and opinions based on any grounds on which such objections could be timely asserted if the experts were entering their opinions through live testimony or to any testimony that may be deemed lay witness testimony.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies on the 6th day of July 2016 that a copy of the above document has been served upon the following persons by:

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